

The FAA abandoned this same proposed change in 1966. Rather than put a reputable company out of business in order to cater to the demands of Piper Aircraft and GAMA, the FAA should abandon this proposed change also. The company that this entire rulemaking issue is aimed at, has never produced a bad, unsafe or problem type of aircraft. To date, there are over fifty of these "Questionable" aircraft in service with no real problems. There has never been an AD Note published due to these fifty aircraft. It appears that the FAA is not really looking at the real safety issue here, rather just the instructions that have been forwarded to the FAA from GAMA.

The "Burden" imposed upon the FAA in the certification of these aircraft under FAR 21.183(d), was brought on by themselves when the decision was made to allow only the MIDO personnel to conduct the airworthiness inspections. Wasn't the FAA motto "Delegate, Delegate, Delegate"?

If this proposed rule is implemented, the FAA should also start looking very closely at the provisions of FAR 21.303(b)(2). Owner, Operator produced parts.

It is my opinion, that this whole issue should be dropped due to the minor amount of total aircraft involved. The FAA makes reference to "Many" new applicants to produce aircraft under FAR 21.183(d), but calls to several Aircraft Certification facilities around the country don't seem to produce any specific examples. It is also my opinion, that this whole issue would probably not have reached the level it has if Piper had not just been handed a handsome civil penalty for producing aircraft that did conform to their Type Design.